

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Anastasia Stathis

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Argionis & Associates, LLC

180 N. LaSalle St. Ste 180, Chicago, IL 60601

DEFENDANTS

Venetian Casino Resort, LLC et al

County of Residence of First Listed Defendant Clark
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Removed from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. Section 1332

Brief description of cause:

Plaintiff slipped and fell on a foreign substance while legally on defendants premises

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

+ 75,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

3/31/09

SIGNATURE OF ATTORNEY OF RECORD

George Argionis

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
SOUTHERN DIVISION OF NEVADA

ANASTASIA STATHIS,)
)
Plaintiff,)
)
v.)
)
VENETIAN CASINO RESORT, LLC.,)
a Nevada Limited Liability Company,)
d/b/a THE VENETIAN RESORT HOTEL)
& CASINO, VENETIAN OPERATING)
COMPANY, LLC., a Limited Liability)
Company, LAS VEGAS SANDS, INC., a)
Nevada Corporation, INTERFACE GROUP)
HOLDING COMPANY, INC., a Nevada)
Corporation,)
)
Defendants.)

No:

Plaintiff Demands Trial by Jury

COMPLAINT AT LAW - PREMISES LIABILITY

NOW COMES the Plaintiff, ANASTASIA STATHIS, by and through her attorneys, ARGIONIS & ASSOCIATES, LLC and CAP & KUDLER, and complaining against the defendants, VENETIAN CASINO RESORT, LLC., a Nevada Limited Liability Company, d/b/a THE VENETIAN RESORT HOTEL & CASINO, VENETIAN OPERATING COMPANY, LLC., a Limited Liability Company, LAS VEGAS SANDS, INC., a Nevada Corporation, INTERFACE GROUP HOLDING COMPANY, INC., a Nevada Corporation, states as follows:

1. Plaintiff, ANASTASIA STATHIS, is a citizen of the State of Illinois and the defendants, and each of them, are citizens of the State of Nevada. The matter in controversy exceeds, exclusive of interest and costs, the sum of \$75,000.00.

2. That on or about May 27, 2007, the Plaintiff, ANASTASIA STATHIS, was a

resident of Cook County, Illinois.

3. That the defendant, VENETIAN CASINO RESORT, LLC., a Nevada Limited Liability Company, d/b/a THE VENETIAN RESORT HOTEL & CASINO is, and was at all relevant times mentioned herein, a Nevada Limited Liability Company duly organized and authorized to conduct business in the State of Nevada.

4. That the defendant, VENETIAN OPERATING COMPANY, LLC, a Nevada Limited Liability Company is, and was at all relevant times mentioned herein, a Nevada Limited Liability Company duly organized and authorized to conduct business in the State of Nevada.

5. That the defendant, LAS VEGAS SANDS, INC., a Nevada Corporation is, and was at all relevant times mentioned herein, a Nevada Corporation duly organized and authorized to conduct business in the State of Nevada.

6. That the defendant, INTERFACE GROUP HOLDING COMPANY, INC., a Nevada Corporation is, and was at all relevant times mentioned herein, a Nevada Corporation duly organized and authorized to conduct business in the State of Nevada.

7. That the defendants named in paragraphs 1 through 5, collectively and/or separately or two or more in concert with each other, own and/or operate the Venetian Hotel and Casino located at 3355 Las Vegas Boulevard South in Clark County, Nevada.

8. That on or about May 27, 2007, and for sometime prior thereto, the defendants, and each of them, possessed, operated, controlled, managed and maintained, or had a duty to possess, operate, manage and control, both directly and indirectly, individually and through its agents, servants and employees, a certain Hotel and Casino located at 3355 Las Vegas Boulevard in Clark County Nevada.

9. That on or about May 27, 2007, the Plaintiff, ANASTASIA STATHIS, was a guest and visitor lawfully on the premises and property possessed, operated, owned, controlled, managed, and maintained by the defendants, and each of them.

10. That on or about May 27, 2007, the Plaintiff, ANASTASIA STATHIS, was walking in the lobby area upon such premises and property, when she stepped upon and into some slippery liquid substance that caused her to slip and fall to the ground.

11. That the defendants, and each of them, owed the Plaintiff and others coming upon said premises and property a duty of reasonable care to design, keep, control, inspect, and maintain said premises and property in a reasonably safe condition, free from all defects and conditions which would render it dangerous and unsafe for their expected and anticipated use by the Plaintiff and others; to exercise reasonable care to keep such premises and property free from hazardous and dangerous conditions; to reasonably provide warning to Plaintiff and others upon reasonable discovery of such hazards and dangers upon said premises and property.

12. The defendants, and each of them, failed to use reasonable care in the design, inspection, maintenance, upkeep, control and or maintenance of the premises, particularly allowing a large puddle of a foreign liquid substance to accumulate on the a floor in the lobby area of the Venetian Resort Hotel & Casino, rendering the premises unreasonably dangerous.

13. The unreasonably dangerous condition, under the exercise of reasonable care should have known to the defendant, and each of them, in adequate time for a reasonably prudent person to warn of, or make safe the condition. The defendants, and each of them, negligently failed and neglected to take any action to warn the plaintiff, ANASTASIA STATHIS, or to make the condition safe.

14. As a proximate result of the aforementioned negligence of the defendants, and each of them, the Plaintiff, ANASTASIA STATHIS, suffered injuries which required and may continue to require medical attention and services all to her continuing expense and damage in an amount which will be proven at time of trial.

15. As a proximate result of the aforementioned negligence of the defendants, and each of them, the Plaintiff, ANASTASIA STATHIS, incurred and may continue to incur pain, suffering, and anguish all to her general damage in an amount in excess of \$75,000.00.

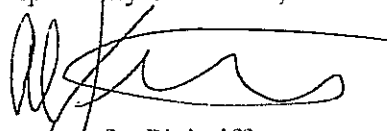
16. As a further proximate result of the aforementioned negligence of the defendants, and each of them, the Plaintiff, ANASTASIA STATHIS, suffered permanent disability all to her continuing damage in an amount in excess of \$75,000.00.

17. As a further and proximate result of the aforementioned negligence of the defendants, and each of the, the Plaintiff, ANASTASIA STATHIS, has been forced to hire counsel to prosecute this action and has incurred and will incur attorney's fees and court costs in an amount to be proven at trial.

WHEREFORE, the Plaintiff, ANASTASIA STATHIS, prays for judgment against the defendants, and each of them, for each and every cause of action as follows:

1. For general damages in an amount in excess of SEVENTY FIVE THOUSAND DOLLARS (\$75,000.00).
2. For special damages in an amount in excess of SEVENTY FIVE THOUSAND DOLLARS (\$75,000.00).
3. For costs of suit and reasonable attorneys fees;
4. For such other relief that this Court may deem just and proper.

Respectfully Submitted,



Attorney for Plaintiff

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